

MELINDA HAAG (CABN 132612)
United States Attorney

MIRANDA KANE (CABN 150630)
Chief, Criminal Division

THOMAS E. STEVENS (CABN 168362)
Assistant United States Attorney

450 Golden Gate Ave., Box 36055
San Francisco, California 94102
Telephone: (415) 436-7200
Fax: (415) 436-7234
E-Mail: Thomas.Stevens@usdoj.gov

Attorney for the United States

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR-12-0459 EMC
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER EXCLUDING TIME
)	UNDER THE SPEEDY TRIAL ACT
)	
v.)	
)	
)	
ANDREA C. MOHR,)	
)	
Defendant.)	
)	

WHEREAS, the above-captioned matter came before the Court on February 27, 2013, for status conference. The United States was represented by AUSA Tom Stevens, and defendant Mohr, who was not present (due to a death in her family), was represented by Marc Axelbaum. The Court set the case for a further status conference on March 20, 2013.

WHEREAS, during the previous status conference on January 16, 2013, the Court, on the record and as reflected in the minute order, excluded time from that date through and including February 27, 2013, for continuity of counsel and counsel's effective preparation (because Mr. Axelbaum had recently substituted into the case).

STIP. AND ~~[PROPOSED]~~ ORDER RE: STA
CR-12-0459 EMC

WHEREAS, counsel for Mohr requested the continuance to the March 20 date, after noting that he had been diligently reviewing discovery, working through technical issues respecting the electronic discovery, and needed more time to complete his discovery review and discuss the case with his client.

NOW THEREFOR, based upon the need for Mohr's counsel effectively to prepare, the parties seek a further exclusion of time under the Speedy Trial Act, through and including March 20, 2013.

SO STIPULATED.

DATED: February 28, 2013

MELINDA HAAG
United States Attorney

_____/s_____
Thomas E. Stevens
Assistant United States Attorney

DATED: February 28, 2013

_____/s_____
Marc Axelbaum
Counsel to Andrea Mohr

[PROPOSED] ORDER

Based upon the above stipulation, the Court finds that the time from and including February 27, 2013, to and including March 20, 2013, should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), because the ends of justice served by the continuance outweigh the best interest of the public and defendant in a speedy trial. The findings are based upon the need for the defendant to have reasonable time necessary for effective preparation pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv), taking into account the exercise of due diligence.

IT IS SO ORDERED.

DATED: February ~~28~~, 2013 March 1, 2013

EDWARD M. CHEN
UNITED STATES JUDGE

